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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 ANDREW CARSON IRVINE,  
15 Defendant.

Case No. 2:08-cr-00340-GMN-LRL-1

**STIPULATION TO ADVANCE  
REVOCATION HEARING**  
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting  
17 United States Attorney, and Jacob H. Operskalski, Assistant United States Attorney, counsel  
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
19 Keisha K. Matthews, Assistant Federal Public Defender, counsel for Andrew Carson Irvine,  
20 that the Revocation Hearing currently scheduled on April 1, 2025, be vacated and advanced to  
21 February 20, 2025 at 10:00 a.m. or a date and time convenient to the Court.

22 This Stipulation is entered into for the following reasons:

23 1. Mr. Irvine is currently receiving treatment at AMG Specialty Hospital. He is  
24 bedridden and requires full assistance with activities of daily living. He is being treated for  
25 several chronic conditions.  
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2. AMG has indicated that they can no longer care for Mr. Irvine. The facility is planning to transfer him out of state for continued treatment.

3. Because of the severity of Mr. Irvine's medical condition, he will have to be transported via a medical transport plane.

4. Additionally, it is counsel's understanding that the proposed out of state facility does not offer the same range of services available at AMG.

5. Defense counsel is concerned that the out of state transport coupled with the reduced scope of services available at the new facility will present adverse health outcomes.

6. The parties would like to advance the hearing to bring this matter before the Court for sentencing prior to his out of state transfer.

7. The United States Marshal Service is diligently working to keep Mr. Irvine in local custody until February 20.

8. The defendant is in custody and agrees with the need for the continuance.

9. The parties agree to the continuance.

This is the first request to advance the revocation hearing.

DATED this 4th day of February 2025.

RENE L. VALLADARES  
Federal Public Defender

SUE FAHAMI  
Acting United States Attorney

By /s/ Keisha K. Matthews  
KEISHA K. MATTHEWS  
Assistant Federal Public Defender

By /s/Jacob H. Operskalski  
JACOB H. OPERSKALSKI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ANDREW CARSON IRVINE,

7 Defendant.  
8

Case No. 2:08-cr-00340-GMN-LRL-1

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Tuesday, April 1, 2025, at 10:00 a.m., be vacated and advanced to February 20, 2025 at the  
12 hour of 10:00 a.m.

13 DATED this 5 day of February 2025.

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16 UNITED STATES DISTRICT JUDGE  
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